

1 / SPECIAL HEARING
stanzler funderburk & castellon llp 2/3/05

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Ms. Debbie Irwin
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, California 95812-0100

Re: Comments on the Reissuance of the National Pollutant Discharge
Elimination System General Permit for Discharges of Storm Water
Associated with Industrial Activity (Industrial General Permit)

Dear Ms. Irvin:

This firm represents the Chemical Batch Processing Monitoring Group, Inc. ("CBPMGI"). CBPMGI is the umbrella group of two storm water monitoring groups, the Chemical Batch Processing Monitoring Group ("CBPMG") and the California Paint Council Monitoring Group ("CPCMG"). CBPMGI respectfully submits these comments on the proposed reissuance of the Industrial General Permit as issued in draft form on December 19, 2004 ("2004 Proposed Permit"). CBPMG and CPCMG are State Water Resources Control Board ("SWRCB") approved monitoring groups in good standing. CBPMGI has been operating under the provisions of the Industrial General Permit since 1992. Our comments are submitted with the desire of our members to meet their compliance obligations in a manner that will result in protection of the state's waters without placing unrealistic and arbitrary burdens of compliance on industrial dischargers. Group members have been proactive in their efforts to improve the management of storm water discharges since the original Industrial General Permit took effect in 1992 and are willing to engage in process of continuous improvement to effect further improvement.

The current proposed permit, however, contains several elements with which our members have expressed deep concern: